

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

SOLAS OLED LTD.,

Plaintiff,

v.

APPLE INC.,

Defendant.

Civil No. 6:19-CV-00537

JURY TRIAL DEMANDED

**DECLARATION OF SHIHCHANG CHANG IN SUPPORT OF DEFENDANT  
APPLE INC.'S MOTION TO TRANSFER VENUE UNDER 28 U.S.C. § 1404(a)**

I, Shihchang Chang, hereby declare and state as follows:

1. I am over 18 years of age and competent to make this declaration. If called to testify as a witness in this matter, I could and would testify truthfully to each of the statements in this declaration.

2. I am employed as a Senior Director in the PPO TFT group at Apple Inc. ("Apple") in Cupertino, California. I have been employed by Apple since July 2007. "PPO" stands for Panel, Process & Optics, and "TFT" stands for thin-film transistor.

3. I provide this declaration in support of Apple's Motion to Transfer Venue Under 28 U.S.C. § 1404(a) to the Northern District of California ("NDCA") filed in the above-captioned case. Unless otherwise indicated below, the statements in this declaration are based upon my personal knowledge, my review of corporate records maintained by Apple in the ordinary course of business, and/or my discussions with Apple employees. If called to testify as a witness, I could and would competently do so under oath.

4. I understand that Solas OLED Ltd. (“Solas”) filed the above-captioned patent infringement lawsuit against Apple in the United States District Court for the Western District of Texas (“WDTX”). I understand that in its Complaint, Solas identified certain Apple products “with organic light-emitting diode (‘OLED’) displays” (the “Accused Technology”). Complaint ¶ 6.

5. I understand that in its Complaint, Solas identified the following list of accused products: iPhone, Apple Watch, and MacBook Pro. Complaint ¶ 6. I also understand that in its Preliminary Infringement Contentions, Solas identified a more specific list of accused products: “MacBook Pro with OLED Touch Bar,” “iPhone X,” “iPhone Xs,” “iPhone Xs Max,” “iPhone 11 Pro,” “iPhone 11 Pro Max,” “Apple Watch,” “Apple Watch Series 1,” “Apple Watch Series 2,” “Apple Watch Series 3,” “Apple Watch Series 4,” and “Apple Watch Series 5” (collectively referred to as “Accused Products”). Disclosure of Preliminary Infringement Contentions § 1.B.

6. Through my work at Apple, I am familiar with the Accused Technology in this case. I manage the teams responsible for the thin-film transistor (“TFT”) layer of the OLED displays in all of the Accused Products. These teams are responsible for determining the display specifications, which are then sent to the vendors that design, manufacture, and supply the OLED displays to Apple for the Accused Products. After providing the vendors with the specifications, the teams that I manage work with the vendors throughout the design process to troubleshoot and finalize the design of the OLED displays in the Accused Products. I work closely with Apple’s vendors and Apple’s engineers to ensure successful implementation of the OLED displays in the Accused Products.

7. The vast majority of the design, development, and implementation of the OLED displays in the Accused Products performed by Apple takes place at Apple’s Cupertino

headquarters. I work at Apple's Cupertino headquarters, as do all of the Apple engineers who are part of the U.S.-based team that I manage. The engineers that are part of the U.S.-based teams responsible for the organic light-emitting layers of the OLED displays in the Accused Products are likewise located at Apple's headquarters in Cupertino. Some in-region vendor support for the OLED displays is provided by Apple employees in Taiwan, China, Japan, and Korea, but these employees serve in primarily support roles to the Apple engineers in Cupertino. None of the design or implementation work done by Apple on the OLED displays in the Accused Products takes place in Texas.

8. Relevant Apple documents concerning the OLED displays in the Accused Products can be accessed at, or are located in or near, Apple's Cupertino headquarters.

9. The vendors that supply Apple with the OLED displays in the Accused Products are located in Asia: Tianma Micro-electronics Co. (China), Samsung Display Co., Ltd. (Korea), LG Display (Korea), and Japan Display (Japan). I and other members of the teams I manage regularly interact with engineers at these vendors on the design and development of the OLED displays in the Accused Product. To my knowledge, the engineers at these vendors with whom Apple engineers interact to design and produce the OLED displays are all located in Asia. I am not aware of any relevant engineers from these vendors who are located in Texas. Likewise, I am not aware of any meetings between Apple and these vendors relating to OLED displays ever taking place in Texas. All of the documents from these vendors in Apple's possession can be accessed at, or are located in or near, Apple's Cupertino headquarters.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and that this declaration was executed this 16 day of January 2020, in Cupertino, California.

  
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Shihchang Chang